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Attorneys for Defendant, Stryker Corporation (sued as  
Stryker)

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

RICHARD GREGUS, an individual,	)	CASE NO. 3:11-CV-00404-RS
	)	
Plaintiff,	)	<b>JOINT STIPULATION TO CONTINUE</b>
	)	<b>CASE MANAGEMENT CONFERENCE;</b>
v.	)	<b>[PROPOSED] ORDER</b>
	)	
STRYKER, a New Jersey Corporation and	)	
DOES 1 to 50, inclusive,	)	
	)	
Defendant.	)	

Plaintiff and defendant, by and through their counsel of record, hereby jointly request and submit this stipulation to continue the case management conference as follows:

WHEREAS the Court has scheduled a Case Management Conference for June 2, 2011 at 10:00 a.m.;

WHEREAS Defendant filed a Motion to Dismiss Plaintiff's First Amended Complaint, and the Court issued an Order dated April 27, 2011 granting Defendant's Motion with leave to amend;

WHEREAS Plaintiff intends to file a Second Amended Complaint on or before May 20,

1 2011;

2 WHEREAS Defendant's response to the forthcoming Second Amended Complaint will  
3 not be due until the Case Management Conference on June 2, or shortly thereafter;

4 WHEREAS the parties wish to conserve resources by allowing Defendant sufficient time  
5 to determine whether plaintiff's forthcoming Second Amended Complaint states a claim for  
6 relief that survives the statute of limitations bar, and any other related issues, as well as time for a  
7 hearing on any requested Court determination of legal issues that might be raised by the Second  
8 Amended Complaint;

9 WHEREAS the parties are discussing the issues required for the Case Management  
10 conference; and

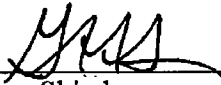
11 WHEREAS there have been no previous modifications of time in this case requested by  
12 the parties, and the parties do not anticipate this modification will have any significant impact on  
13 this case.

14  
15 NOW, THEREFORE, IT IS HEREBY STIPULATED:

- 16 1. The Case Management Conference currently on calendar for June 2, 2011 shall be  
17 continued to August 4, 2011.

18 DATED: May 18, 2011

LAW OFFICES OF GENE SHIODA

19 By:   
20 Gene Shioda  
21 James Kim  
Attorneys for Plaintiff

22 DATED: May 19, 2011

SEDGWICK LLP

23  
24 By: /s/ James Nelson  
25 Ralph Campillo  
26 Mario Horwitz  
27 James Nelson  
28 Attorneys for Defendant, Stryker Corporation

Sedgwick  
DETERT, WOMAN & ARNOLD LLP

**[PROPOSED] ORDER**

Pursuant to the stipulated request of the parties, the Court hereby orders that:

- 1) The Case Management Conference currently on calendar for June 2, 2011 shall be continued to August 4, 2011.

Dated: May 24, 2011



HONORABLE RICHARD SEEBORG